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March 23, 1995

DIRECT DIAL:

94-57

**EX PARTE**

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Suite 222  
Washington, D.C. 20554

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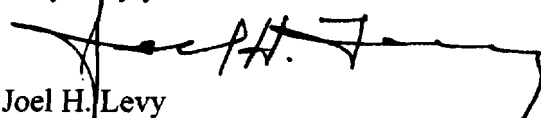
Re: CC Docket No. 94-54 Equal Access and Interconnection Obligations  
Pertaining to Commercial Radio Services; GN Docket No. 93-252  
Implementation of Sections 3(n) and 332 of the Communications Act

Dear Mr. Caton

On Wednesday, March 22, 1995, David Gusky and I, Joel H. Levy, met with Commissioner Susan Ness and her assistant Mary McManus to discuss the position of the National Wireless Resellers Association (formerly, the National Cellular Resellers Association) as reflected in the comments filed by NCRA in the above-referenced dockets. At the request of Commissioner Ness, I am also delivering to her by this letter, which is submitted herewith in duplicate, and attaching herewith a copy of a three page document dated January 24, 1994 issued by the NCRA and entitled, "Comparison of Cellular Service Prices in the 30 Largest Markets for Personal Safety and Convenience Use: January, 1988 - January, 1994."

The meeting also discussed the pending petition of the state of California in PR Docket No. 94-105 to retain regulatory authority over intra-state cellular service rates.

Very truly yours

  
Joel H. Levy

Enclosure

cc: Commissioner Susan Ness w/enc.  
Mary McManus, Esq. w/enc.

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List A B C D E

**NCRA**

**NATIONAL CELLULAR RESELLERS ASSOCIATION**

**COMPARISON  
OF CELLULAR SERVICE PRICES  
IN THE  
30 LARGEST MARKETS  
FOR PERSONAL SAFETY  
AND CONVENIENCE  
USE:  
JANUARY, 1988 - JANUARY, 1994**

**January 24, 1994**

***1825 Eye Street, N.W., Suite 400, Washington, D.C. 20006 (202) 429-2014: FAX: (202) 857-0897***

1/24/94

# **NATIONAL CELLULAR RESELLERS ASSOCIATION**

## **COMPARISON OF CELLULAR SERVICE PRICES FOR PERSONAL SAFETY AND CONVENIENCE USE: JANUARY, 1988 - JANUARY, 1994**

The following table shows the best rates available in the 30 largest cellular markets for 30 minutes of monthly airtime in January, 1988 and January, 1994. NCRA believes this amount of airtime, divided into 20 minutes of usage during peak hours and 10 minutes of usage during off-peak hours, represents a reasonable calling pattern for individuals using a cellular phone chiefly for personal safety and convenience.

| <b>1988<br/>\$ Diff</b> | <b>Market #</b>        | <b>City</b> | <b>System</b> | <b>1988</b>    | <b>1994</b>    | <b>% Change</b> | <b>1994<br/>\$ Diff</b> |
|-------------------------|------------------------|-------------|---------------|----------------|----------------|-----------------|-------------------------|
| <b>\$3.50</b>           | <b>1 New York</b>      |             | <b>A</b>      | <b>\$32.50</b> | <b>\$39.99</b> | <b>23.0%</b>    | <b>\$5.66</b>           |
|                         |                        |             | <b>B</b>      | <b>\$36.00</b> | <b>\$45.65</b> | <b>26.8%</b>    |                         |
| <b>\$0.00</b>           | <b>2 Los Angeles</b>   |             | <b>A</b>      | <b>\$45.00</b> | <b>\$45.00</b> | <b>0.0%</b>     | <b>\$0.00</b>           |
|                         |                        |             | <b>B</b>      | <b>\$45.00</b> | <b>\$45.00</b> | <b>0.0%</b>     |                         |
| <b>\$1.00</b>           | <b>3 Chicago</b>       |             | <b>A</b>      | <b>\$20.00</b> | <b>\$28.35</b> | <b>41.8%</b>    | <b>\$4.14</b>           |
|                         |                        |             | <b>B</b>      | <b>\$21.00</b> | <b>\$24.21</b> | <b>15.3%</b>    |                         |
| <b>\$1.00</b>           | <b>4 Philadelphia</b>  |             | <b>A</b>      | <b>\$22.95</b> | <b>\$34.95</b> | <b>52.3%</b>    | <b>\$0.30</b>           |
|                         |                        |             | <b>B</b>      | <b>\$23.95</b> | <b>\$34.65</b> | <b>44.7%</b>    |                         |
| <b>\$0.00</b>           | <b>5 Detroit</b>       |             | <b>A</b>      | <b>\$16.10</b> | <b>\$30.95</b> | <b>92.2%</b>    | <b>\$0.00</b>           |
|                         |                        |             | <b>B</b>      | <b>\$16.10</b> | <b>\$30.95</b> | <b>92.2%</b>    |                         |
| <b>\$3.00</b>           | <b>6 Boston</b>        |             | <b>A</b>      | <b>\$22.50</b> | <b>\$33.15</b> | <b>47.3%</b>    | <b>\$5.20</b>           |
|                         |                        |             | <b>B</b>      | <b>\$19.50</b> | <b>\$27.95</b> | <b>43.3%</b>    |                         |
| <b>\$0.00</b>           | <b>7 San Francisco</b> |             | <b>A</b>      | <b>\$56.00</b> | <b>\$44.74</b> | <b>-20.1%</b>   | <b>\$0.26</b>           |
|                         |                        |             | <b>B</b>      | <b>\$56.00</b> | <b>\$45.00</b> | <b>-19.6%</b>   |                         |
| <b>\$1.95</b>           | <b>8 Wash/Balt</b>     |             | <b>A</b>      | <b>\$22.00</b> | <b>\$33.70</b> | <b>53.2%</b>    | <b>\$0.95</b>           |
|                         |                        |             | <b>B</b>      | <b>\$23.95</b> | <b>\$34.65</b> | <b>44.7%</b>    |                         |
| <b>\$0.00</b>           | <b>9 Dallas</b>        |             | <b>A</b>      | <b>\$30.00</b> | <b>\$42.39</b> | <b>41.3%</b>    | <b>\$0.44</b>           |
|                         |                        |             | <b>B</b>      | <b>\$30.00</b> | <b>\$41.95</b> | <b>39.8%</b>    |                         |
| <b>\$2.75</b>           | <b>10 Houston</b>      |             | <b>A</b>      | <b>\$28.95</b> | <b>\$31.99</b> | <b>10.5%</b>    | <b>\$7.96</b>           |
|                         |                        |             | <b>B</b>      | <b>\$26.20</b> | <b>\$39.95</b> | <b>52.5%</b>    |                         |
| <b>\$0.00</b>           | <b>11 St. Louis</b>    |             | <b>A</b>      | <b>\$23.00</b> | <b>\$26.95</b> | <b>17.2%</b>    | <b>\$3.00</b>           |
|                         |                        |             | <b>B</b>      | <b>\$23.00</b> | <b>\$29.95</b> | <b>30.2%</b>    |                         |
| <b>\$4.50</b>           | <b>12 Miami</b>        |             | <b>A</b>      | <b>\$30.00</b> | <b>\$52.70</b> | <b>75.7%</b>    | <b>\$3.15</b>           |
|                         |                        |             | <b>B</b>      | <b>\$34.50</b> | <b>\$49.55</b> | <b>43.6%</b>    |                         |
| <b>\$18.75</b>          | <b>13 Pittsburgh</b>   |             | <b>A</b>      | <b>\$14.20</b> | <b>\$39.99</b> | <b>181.6%</b>   | <b>\$1.94</b>           |
|                         |                        |             | <b>B</b>      | <b>\$32.95</b> | <b>\$38.05</b> | <b>15.5%</b>    |                         |

|         |                 |   |         |         |        |         |
|---------|-----------------|---|---------|---------|--------|---------|
| \$6.60  | 15 Minneapolis  | A | \$26.95 | \$32.24 | 11.4%  |         |
|         |                 | B | \$35.55 | \$35.85 | 0.8%   | \$3.61  |
| \$0.05  | 16 Cleveland    | A | \$27.95 | \$30.95 | 10.7%  |         |
|         |                 | B | \$28.00 | \$29.75 | 6.3%   | \$1.20  |
| \$0.00  | 17 Atlanta      | A | \$40.00 | \$33.70 | -15.7% |         |
|         |                 | B | \$40.00 | \$41.75 | 4.4%   | \$8.05  |
| \$8.35  | 18 San Diego    | A | \$45.00 | \$36.55 | -18.8% |         |
|         |                 | B | \$36.65 | \$38.00 | 3.7%   | \$1.45  |
| \$6.05  | 19 Denver       | A | \$29.50 | \$36.59 | 24.0%  |         |
|         |                 | B | \$35.55 | \$36.95 | 3.9%   | \$0.36  |
| \$11.75 | 20 Seattle      | A | \$29.50 | \$29.99 | 1.7%   |         |
|         |                 | B | \$41.25 | \$29.95 | -27.4% | \$0.04  |
| \$1.30  | 21 Milwaukee    | A | \$20.00 | \$29.95 | 49.7%  |         |
|         |                 | B | \$21.30 | \$27.00 | 26.8%  | \$2.95  |
| \$0.80  | 22 Tampa        | A | \$26.80 | \$34.95 | 30.4%  |         |
|         |                 | B | \$27.60 | \$46.45 | 68.3%  | \$11.50 |
| \$0.05  | 23 Cincinnati   | A | \$17.95 | \$30.95 | 72.4%  |         |
|         |                 | B | \$18.00 | \$24.91 | 38.4%  | \$8.04  |
| \$0.00  | 24 Kansas City  | A | \$25.50 | \$33.45 | 31.2%  |         |
|         |                 | B | \$25.50 | \$35.85 | 40.6%  | \$2.40  |
| \$13.10 | 25 Buffalo      | A | \$25.10 | \$27.65 | 10.2%  |         |
|         |                 | B | \$12.00 | \$23.35 | 94.6%  | \$4.30  |
| \$6.60  | 26 Phoenix      | A | \$26.95 | \$39.25 | 35.6%  |         |
|         |                 | B | \$35.55 | \$40.25 | 13.2%  | \$1.00  |
| \$3.00  | 28 Indianapolis | A | \$12.00 | \$26.95 | 124.6% |         |
|         |                 | B | \$15.00 | \$24.95 | 66.3%  | \$2.00  |
| \$9.40  | 29 New Orleans  | A | \$42.90 | \$33.95 | -20.9% |         |
|         |                 | B | \$33.50 | \$33.95 | 1.3%   | \$0.00  |
| \$1.50  | 30 Portland     | A | \$25.00 | \$35.00 | 40.0%  |         |
|         |                 | B | \$23.50 | \$33.50 | 42.6%  | \$1.50  |
| \$3.75  | Averages        |   | \$26.67 | \$35.12 | +32.4% | \$2.84  |

The monthly airtime charges contained in this report were calculated by using data obtained from Information Enterprises and the customer service departments of the licensed carriers in each market listed above. The monthly airtime charges reflect the best rates available on service contracts not exceeding one year in length.